

COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Piedmont Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Virginia Electric and Power Company – Chesterfield Power Station
Chesterfield, Virginia
Permit No. PRO-50396

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Virginia Power has applied for a Title V Operating Permit for its Chesterfield facility. The Department reviewed the application and issued a Title V permit on November 3, 2003.

Engineer/Permit Contact:_____ Date:_____

Air Permit Manager:_____ Date:_____

Deputy Regional Director:_____ Date:_____

FACILITY INFORMATION

Virginia Electric and Power Company
5000 Dominion Boulevard
Glen Allen VA 23060

Chesterfield Power Station
End of Coxendale Road (Route 615)
Chesterfield VA
AIRS ID No. 51-041-0002

SOURCE DESCRIPTION

SIC Code: 4911 – Electrical Power Generation

The Chesterfield Power Station burns fossil fuel for the generation of electrical power. The facility operates four pulverized coal, tangentially-fired dry bottom boilers (ES-3, ES-4, ES-5, ES-6) and two General Electric combined cycle combustion turbines (ES-7, ES-8). Three of the boilers, ES-3, ES-4 and ES-6, burn coal and no. 2 fuel oil. Boiler ES-5 burns coal, no. 2 fuel oil and waste oil. The two combustion turbines, ES-7, ES-8, burn natural gas, no. 2 fuel oil and coal gas. Each boiler has an electrostatic precipitator (ESP) to control particulate emissions and the facility is installing selective catalytic reduction (SCR) equipment on units ES-4, ES-5 and ES-6 to control nitrogen dioxide (NOx) emissions. The combustion turbines use steam injection to control NOx emissions. The facility also operates coal and ash handling systems, fuel oil storage tanks and emergency diesel generators.

The facility is a Title V major source of PM-10, nitrogen dioxide, sulfur dioxide, carbon monoxide, and volatile organic compounds. The Chesterfield Power Station is located in an attainment area for all pollutants, and is a PSD major source. There are three active permits for the Chesterfield Power. There is a February 9, 2001 state operating permit that contains all the non-acid rain requirements of the previous permits, a Phase II November 25, 2002 acid rain permit and a March 10, 2003 new source review permit for a coal crusher.

Title V Permit

NOx SIP Call

A requirement by reference condition was originally added to the Title V permit and used to address this applicable requirement. This permit modification adds the exact regulatory requirements of the NOx Budget Trading Program (9 VAC 5 Chapter 140).

Permit issued on November 3, 2003 to operate an electric power generating plant in accordance with 9 VAC Chapter 80 of the Virginia Regulations for the Control and Abatement of Air Pollution. On November 25, 2003, Dominion requested a modification to the Title V permit for several administrative changes. Dominion requested that DEQ streamline several conditions that are listed in both the Title V and supporting permits, clarify permit condition references from supporting permits and correct typographic errors.

Dominion also requested that DEQ not list the fuel flow monitors for start-up on oil because the continuous emission monitors make this requirement redundant. Dominion also requested the removal of any language concerning the EPA Consent Decree. EPA has agreed that DEQ "has the discretion to decide when to add the requirements of the consent decree that will not become effective for some time in the future." DEQ will make these changes as an administrative permit amendment (9 VAC 5-80-200).

Active permits

Permit issued on March 10, 2003: This is a new source review permit to construct and operate one new 1,000 ton/hour coal crusher.

Permit issued on February 9, 2001: This is a state operating permit that contains all of the requirements of the previous permits, except the acid rain requirements. The purpose of the SOP was to install selective catalytic reduction (SCR) equipment to control NOx emissions on units ES-4, ES-5 and ES-6. This equipment was installed as a pollution control project (PCP), which was exempt from new source review, although there was an increase in PM10 emissions from the use of the SCRs. The original state operating permit was issued on August 27, 1996. The purpose of the original permit was to make the summer time (June, July and August) nitrogen oxide reductions federally and state enforceable.

Permit issued on November 25, 2002; The permit is a Phase II acid rain permit. The permit contains SO2 allowances and NOx limits.

Historical Permits (superseded by active permits)

Permit issued on September 16, 1998; Virginia Power increased the ash utilization project throughput. This permit increased the ash throughput from 500,000 tons/yr to 2,000,000 tons/yr. This increase in throughput was a new source review modification to a State Major Operating permit. This permit was public noticed in the Richmond Times Dispatch.

Permit issued on July 16, 1997; This proposal was a new source review modification to a previously issued SOP. The modification increased the ash throughput from 180,000 tons/yr to 200,000 tons/yr. This permit increased the emissions above the modification emissions level. The permitted emissions for the ash reutilization project for this modification were 24.6 tons/yr TSP and 7.9 tons/yr PM10. The emissions increases were more than the modification emissions levels listed in 9 VAC 5-80-11 E. A public notice was published in the Richmond Times Dispatch and no comments were received.

Permit issued on February 18, 1997: This proposal was an administrative amendment to a previously issued SOP. This amendment was for the initial ash reutilization project. The uncontrolled emissions were greater than the modification emissions level listed in 9 VAC 5-80-11 E. A public notice was not required for this modification because the emissions were below the modification emissions level in VAC 5-80-11 E.

Permit issued on August 27, 1996: This permit is the original SOP for Virginia Power Chesterfield. The permit included all existing source requirements, new source requirements, and the requirements of a PSD permit. The facility wide permit was used to enforce a NO₂ reduction. The reduction was used as a growth cap for the Richmond Area Nonattainment Area.

Permit issued on September 24, 1993: This permit was a "stand alone" minor NSR permit that allowed the facility to add an oil gun to boiler number 5. The oil gun is used to fire waste oil into the boiler. The permit allows only waste oils generated by Virginia Power to be fired in the boiler.

COMPLIANCE STATUS

The facility is inspected a minimum of once a year. The facility was last inspected on August 27, 2002 and the inspector found the facility in compliance with all permit requirements.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment: Boilers							
ES-3A	EP-3	Combustion Engineering Tangentially Fire Coal Boiler equipped with Startup Burners (1952)	1155 x 10 ⁶ Btu/hr	Environmental Elements Corporation electrostatic precipitator, Staged Coal Combustion Burners	CD-3	PM-10, NOx	State Operating Permit February 9, 2001; Acid Rain Permit December 10, 1998
ES-4A	EP-4	Combustion Engineering Tangentially Fire Coal Boiler equipped with Startup Burners (1960)	1761x 10 ⁶ Btu/hr	American Air Filter electrostatic precipitator, Staged Combustion Coal Burners, SCR (under construction)	CD-4	PM-10, NOx	State Operating Permit February 9, 2001; Acid Rain Permit December 10, 1998
ES-5A	EP-5	Combustion Engineering Tangentially Fire Coal Boiler equipped with startup burner (1964)	3604x 10 ⁶ Btu/hr	UOP- Air Filter Products Divisions electrostatic precipitator, Staged Combustion Coal Burners, SCR (under construction)	CD-5	PM-10, NOx	State Operating Permit February 9, 2001; Acid Rain Permit December 10, 1998
ES-6A	EP-6	Combustion Engineering Tangentially Fire Boiler Coal Boiler equipped with Startup Burners (1969)	6650x 10 ⁶ Btu/hr	Research Cotrell electrostatic precipitator, Staged Combustion Coal Burners, SCR (under construction)	CD-6	PM-10, NOx	State Operating Permit February 9, 2001; Acid Rain Permit December 10, 1998
Fuel Burning Equipment: Turbines							
ES-7A,B,C	EP-7	Combustion Turbine General Electric STAG 107F (1990)	1980.4 Btu/hr	General Electric Steam Injection System	CD-7	NOx	State Operating Permit February 9, 2001 PSD Permit December 28, 1987
ES-8A,B,C	EP-8	Combustion Turbine General Electric STAG 107F (1992)	1980.4 Btu/hr	General Electric Steam Injection System	CD-8	NOx	State Operating Permit February 9, 2001 PSD Permit December 28, 1987;

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							Acid Rain Permit December 10, 1998
Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Coal and Fly ash Processing:							
ES-9a	EP-9	Coal receiving: One (1) Heyl & Patterson railcar unload station	1400 Tons/hr	Good Material Handling Practices	NA	PM-10	State Operating Permit February 9, 2001
ES-9c	EP-9	Coal Conveying System: Continental Conveyors	400-1200 Tons/hr	Good Material Handling Practices	NA	PM-10	State Operating Permit February 9, 2001
ES-9d	EP-9	Coal Pile Maintenance and Wind Erosions	750,000 Tons	Good Material Handling Practices	NA	PM-10	State Operating Permit February 9, 2001
ES-9e	EP-9	Coal Crushing Operations: One (1) Pennsylvania Crusher Corporation Model TTK 36 x 68 Granular (2003)	1,000 Tons/hr	Good Material Handling Practices	NA	PM-10	New Source Review Permit March 10, 2003
ES-10	EP-10	Fly Ash Reutilization Operations	500,000 Tons/yr	Baghouse, wet suppression	CD-10	PM-10	State Operating Permit February 9, 2001
Emergency Combustion Turbines:							
IS-1		Solar T-351 N Simple Cycle Combustion Turbine	4.7×10^6 Btu/hr		NA	NOx	State Operating Permit February 9, 2001
IS-2		Solar T-351 N Simple Cycle Combustion Turbine	4.7×10^6 Btu/hr		NA	NOx	State Operating Permit February 9, 2001
Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Emergency Diesel Generator:							
IS-3		Detroit Diesel Generator	7.7×10^6 Btu/hr		NA	NOx	State Operating Permit February 9, 2001
Fuel Oil Storage Tanks:							
IS-5		Fuel Oil Storage Tank	11,256,000 gallons		NA	VOC	State Operating Permit February 9, 2001

The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

EMISSIONS INVENTORY

A copy of the 2001 annual emission update is attached as Attachment A. Emissions are summarized in the following tables.

2001 Actual Facility Wide Emissions (From the 2001 CEDs reports)

Criteria Pollutant	Criteria Pollutant Emission
CO	813.8
NOx	16,902.5
PM-10	1,143.1
SO ₂	66,095.3
VOC	101.1

2001 Actual Facility Wide Hazardous Air Pollutant Emissions (From the 2001 CEDs reports)

Pollutant	Hazardous Air Pollutant Emission in Tons/Year
Cl	0.06
HCL	1,894.2
HF	236.8
TOTAL:	2,131.1

EMISSION UNIT APPLICABLE REQUIREMENTS

State Operating Permit and New Source Review Requirements

Most of the conditions in the Title V permit are requirements to comply with the new source review permit issued on March 10, 2003, the state operating permit issued on February 9, 2001 and the acid rain permit issued on November 25, 2002. Copies of these permits, which contain these requirements, are attached to this document.

There are a number of federal regulations that apply to some of the units at the Chesterfield Power Station. These regulations and units are:

- < 40 CFR Part 60, Subpart A – General Provisions. This standard applies to the Combustion Turbines.
- < 40 CFR Part 60, Subpart GG - Standards of Performance for Stationary Gas Turbines. This standard applies to the Combustion Turbines.
- < 40 CFR Part 60, Subpart Y - Standards of Performance for Coal Preparation Plants. This standard applies to the Coal Handling System.

- < 40 CFR Part 61 - Asbestos. Details requirements for asbestos removal at demolition and renovation activities. If such activities should occur, the facility shall comply with the applicable provisions. This standard applies facilitywide.
- < 40 CFR Part 63 - National Emissions Standards for Hazardous Air Pollutants for Source Categories. No standards have currently been promulgated for this facility. However, Subparts YYYY (Combustion Turbines) and ZZZZ (Reciprocating Internal Combustion Engines) are **future applicable requirements**.
- < 40 CFR Part 64 - Compliance Assurance Monitoring (CAM) Requirements. Details requirements for Compliance Assurance Monitoring. This standard applies to the four boilers and one combustion turbine (Units 3, 4, 5, 6 & 8).
- < 40 CFR Part 68 - Chemical Accident Prevention Provisions. Describes requirements for Risk Management Plans. This standard applies facilitywide.
- < 40 CFR Part 70 - Operating Permits Regulation. Institutes operating permit requirements. This standard applies facilitywide.
- < 40 CFR Part 72, Subparts A, B, C, D, E, and F - Acid Rain Program. This standard applies to the four boilers and one combustion turbine (Units 3, 4, 5, 6, & 8).
- < 40 CFR Part 73, Subparts B, C, and D - Acid Rain Allowances. This standard applies to the four boilers and one combustion turbine (Units 3, 4, 5, 6 & 8).
- < 40 CFR Part 75, Subparts A, B, C, D, E, F, and G - Acid Rain Program Monitoring Requirements. This standard applies to the four boilers and one combustion turbine (Units 3, 4, 5, 6 & 8).
- < 40 CFR Part 76 - Acid Rain Program, Phase II NO_x Limitations. This standard applies to the four boilers and one combustion turbine (Units 3, 4, 5, 6 & 8).
- < 40 CFR Part 77 - Acid Rain Program, Excess Emissions. This standard applies to the four boilers and one combustion turbine (Units 3, 4, 5, 6 & 8).
- < 40 CFR Part 78 - Acid Rain Program Appeal Procedures. This standard applies to the four boilers and one combustion turbine (Units 3, 4, 5, 6 & 8).
- < 40 CFR Part 82 - Protection of Stratospheric Ozone - Subpart B - Servicing of Motor Vehicle Air Conditioners. This standard applies facilitywide.
- < 40 CFR Part 82 - Protection of Stratospheric Ozone - Subpart F - Recycling and Emissions Reduction. This standard applies facilitywide.
- < 40 CFR 97 - NO_x Budget. Outlines emissions limitations and compliance schedules for NO_x reductions. This standard applies to the four boilers and one combustion turbine (Units 3, 4, 5, 6, 7 & 8).

Other applicable requirements that apply to the source are the following provisions of the Commonwealth of Virginia State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution:

9 VAC 5 Chapter 40	Existing Stationary Sources
9 VAC 5 Chapter 40	Article 1: Visible Emissions and Fugitive Dust/Emissions
9 VAC 5 Chapter 40	Article 8: Emission Standards for Fuel Burning Equipment
9 VAC 5 Chapter 50	New and Modified Stationary Sources
9 VAC 5 Chapter 50	Article 1: Visible Emissions and Fugitive Dust/Emissions

9 VAC 5 Chapter 80	Part I: Permits for New and Modified Sources
9 VAC 5 Chapter 80	Article 1: Federal Operating Permits for Stationary Sources
9 VAC 5 Chapter 80	Article 2: Permit Program Fees for Stationary Sources
9 VAC 5 Chapter 80	Article 4: Insignificant Activities
9 VAC 5 Chapter 80	Article 8: Permits for Major Stationary Sources and Major Modifications Locating in Prevention of Significant Deterioration Areas

a. Generally Applicable Requirements

Generally applicable requirements which apply to the source are the following provisions of the Commonwealth of Virginia State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution:

9 VAC 5 Chapter 170	General Administration
9 VAC 5 Chapter 20	Variance, circumvention, source registration, maintenance practices, and start-up, shutdown, and malfunction procedures
9 VAC 5 Chapter 80	Article 2: Permit Program Fees for Stationary Sources
9 VAC 5 Chapter 140	Emissions trading

The emergency combustion turbines (IS-1, IS-2), the diesel generator (IS-3) and the oil storage tank (IS-5) are significant emission units because these units have applicable requirements (permit conditions) in the February 9, 2001 SOP.

Periodic Monitoring

The permit content requirements of the regulations for federal operating permits, 9 VAC 5-80-110, state that the permit should include conditions for periodic monitoring sufficient to demonstrate that the facility is in compliance with the limits of the permit. These conditions are contained in the Title V permit and the supporting SOP and NSR permits. The Chesterfield Power Station installed a dilution-extractive continuous emission monitoring system (CEM) in stacks ES-3, ES-4, ES-5, ES-6 and ES-8. The CEMs measure effluent concentration of SO₂, NO_x and CO₂. The facility also has a continuous opacity monitor (COM) in each of these stacks.

Emission Unit ID	SO ₂ /Control	NO _x /Control	CO ₂ /Control	Particulate/Control
ES-3	CEM/U	CEM/SCR*	CEM/U	COM/ESP
ES-4	CEM/U	CEM/SCR*	CEM/U	COM/ESP
ES-5	CEM/U	CEM/SCR*	CEM/U	COM/ESP
ES-6	CEM/U	CEM/SCR*	CEM/U	COM/ESP
ES-8	CEM/U	CEM/SCR*	CEM/U	COM/U

SCR – selective catalytic reduction – under construction

U - uncontrolled

ESP – electrostatic precipitator

The Title V permit contains an opacity observation requirement for the coal handling equipment (ES-9A, ES-9-C, ES-9D, ES-9E) in permit condition number 70. The facility is required to make a periodic visual evaluation of the coal handling equipment once a week. The facility is required to take corrective action or perform a Method 9 and take corrective action, if necessary. The facility is required to document these weekly observations in a log book.

Standard Testing Methods

The Title V permit contains a list of an appropriate test methods in permit condition number 28.

Streamlined/Obsolete Requirements

Certain conditions of previously issued permits for the source are obsolete, no longer serve any meaningful purpose, and are unnecessary for Title V considerations. These conditions are as follows:

Condition # 10 of the March 10, 2003 New Source Review Permit :

The two existing coal crushers (American Pulverizer model AC7D) each rated at 700 tons/hr shall be replaced with one coal crusher (ES-9e) rated at 1,000 tons/hr. Reactivation of the old replaced coal crushers may require a permit.

Reason for removal: The two existing coal crushers rated at 700 tons/hr have been permanently removed from the site.

Condition # 14 subparts 1, 2, 3 of the March 10, 2003 New Source Review Permit (Note subpart 4 remains in the permit because it is still pending):

1. The permittee shall furnish written notification to the Piedmont Region:
 1. The actual date on which construction of the coal crusher (ES-9e) commenced within 30 days after such date.
 2. The anticipated start-up date of the coal crusher (ES-9e) postmarked not more than 60 days nor less than 30 days prior to such date.
 3. The actual start-up date of the coal crusher (ES-9e) within 15 days after such date.

Condition # 65 of the February 9, 2001 State Operating Permit:

Records shall be kept indicating the content and vapor pressure of the liquid stored in each of the following tanks, the two (2) fixed roof storage tanks each with a storage capacity of 11,256,000 gallons, the fixed roof fuel oil storage tank with a storage capacity of 420,000 gallons, and the fixed roof fuel oil storage tank with a storage capacity of 60,000 gallons.

Condition # 24 of the February 9, 2001 State Operating Permit: The startup, shut down, and malfunction opacity exclusion listed in 9 VAC 5-40-20 A 3 cannot be included in any Title V

permit. This portion of the regulation is not part of the federally approved state implementation plan. The opacity standard applies to existing sources at all times including startup, shutdown, and malfunction. Opacity exceedances during malfunction can be affirmatively defended provided all requirements of the affirmative defense section of this permit are met. Opacity exceedances during startup and shut down will be reviewed with enforcement discretion using the requirements of 9 VAC 5-40-20 E, which state that "At all times, including periods of startup, shutdown, soot blowing and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions."

Following equipment has been removed from equipment listing since it has been permanently removed from the site:

- One 11, 256,000 gal Fuel Oil Storage Tank
- One 420,000 gal Ignition Oil Tank

STATE ONLY APPLICABLE REQUIREMENTS

The following terms and conditions are not required under the federal Clean Air Act or under any of its applicable federal requirements, and are not subject to the requirements of 9 VAC 5-80-290 concerning review of proposed permits by EPA and draft permits by affected states.

Odor (9 VAC 5 Chapter 40, Article 2)
State toxics rule (9 VAC 5 Chapter 60)
(9 VAC 5-80-110 N and 9 VAC 5-80-300)

FUTURE APPLICABLE REQUIREMENTS

40 CFR Part 63 - National Emissions Standards for Hazardous Air Pollutants for Source Categories. No standards have currently been promulgated for this facility. However, Subparts YYYY (Combustion Turbines) and ZZZZ (Reciprocating Internal Combustion Engines) are **future applicable requirements**.

INAPPLICABLE REQUIREMENTS

None

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or

reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
IS-4	Natural Gas Heater	9 VAC 5-80-710 B	NOx, CO, PM-10, SO ₂ , CO	6.86 X 10 ⁶ Btu/hr
IS-8	Gasoline Tank	9 VAC 5-80-710 B	VOC	5,000 gallons
IS-9	Gasoline Dispensing Station A and B	9 VAC 5-80-710 B	VOC	N/A
IS-10	Electro-Hydraulic Control (EHC) Systems	9 VAC 5-80-710 B	VOC	< 500 gallons
IS-11	Kerosene Tank for Space Heating	9 VAC 5-80-710 B	VOC	504 gallons
IS-12	Fly Ash Sluicing System and Pond	9 VAC 5-80-710 B	TSP/PM10	N/A
IS-13	Parts Degreasers	9 VAC 5-80-710 B	VOC	= < 500 gallons
IS-14	Miscellaneous Fuel Oil Storage Tank	9 VAC 5-80-710 B	VOC	< 1,000 gallons
IS-15	Air Compressor Lube Oil System	9 VAC 5-80-710 C	VOC	< 1,000 gallons
IS-16	Air Preheater Lube Oil System	9 VAC 5-80-710 C	VOC	< 1,000 gallons
IS-17	Boiler Circulating Water Pump Lube Oil System	9 VAC 5-80-710 C	VOC	< 1,000 gallons
IS-18	Boiler Feed Water System Lube Oil Systems	9 VAC 5-80-710 C	VOC	< 1,000 gallons
IS-19	Forced Draft Fan Lube Oil System	9 VAC 5-80-710 C	VOC	< 1,000 gallons

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
IS-20	Induced Draft Fan Lube Oil System	9 VAC 5-80-710 C	VOC	< 1,000 gallons
IS-21	Generator Cooling Oil System	9 VAC 5-80-710 C	VOC	< 1,000 gallons
IS-22	Generator hydrogen seal system	9 VAC 5-80-710 C	VOC	< 1,000 gallons
IS-23	Unit 6 Primary Air Fan Lube Oil System	9 VAC 5-80-710 C	VOC	< 1,000 gallons
IS-24	Lube Oil Storage Tanks	9 VAC 5-80-710 B	VOC	=< 16, 000 gallons
IS-25	Lube Oil Storage Tanks	9 VAC 5-80-710 C	VOC	< 1,000 gallons
IS-26	Turbine Lube Oil Systems	9 VAC 5-80-710 B	VOC	< 7,500 gallons
IS-27	Coal Sampling System Hydraulic Oil Tank	9 VAC 5-80-710 C	VOC	60 gallons
IS-28	Natural Gas Drip Tank	9 VAC 5-80-710 B	VOC	< 500 gallons
IS-29	Coal Car Thaw Shed Propane Vaporizer	9 VAC 5-80-710 B	VOC	0.58×10^6 Btu/hr
IS-30	Coal Car Thaw Shed	9 VAC 5-80-710 B	VOC	38.5×10^6 Btu/hr
IS-31	Oil Sludge Tank	9 VAC 5-80-710 B	VOC	< 500 gallons
IS-32	Waste Oil Tanks	9 VAC 5-80-710 B	VOC	60,000gallons and 2,800 gallons
IS-33	Propane Storage Tank	9 VAC 5-80-710 B	VOC	30,000 gallons
IS-37	Two (2) Ammonia Storage Tanks	9 VAC 5-80-710 B	VOC	45,000 gallons EACH

PHASE II ACID RAIN ALLOWANCES AND REQUIREMENTS

The Chesterfield Power is a utility owned facility and is subject to 40 CFR 72.1 and 9 VAC 5-80-

360 regarding federal operating permits for acid rain sources. The Phase I Acid Rain permit was issued on June 3, 1997 to control NOx emissions on units ES-3 and ES-4. The Phase II Acid Rain Permit was issued on November 25, 2002 and applies to units ES-3, ES-4, ES-5, ES-6 and ES-8. Unit 7 is exempt from the acid rain regulation because it is a simple cycle turbine (a combined cycle without a duct burner is a simple cycle turbine in the acid rain regulations) that started operation prior to November 15, 1990. Under the regulations, the coal fired units are subject to NOx emission reductions and the combustion turbine is subject to SO2 reductions.

NOx ALLOWANCE BUDGET TRADING PERMIT REQUIREMENTS

The Chesterfield Power Station is subject to the NOx Allowance Budget Trading Program (9 VAC 5-140-10) regulations and the facility submitted a permit application to EPA on March 18, 2003. These regulations affect units ES-3, ES-4, ES-5, ES-6, ES-7 and ES-8.

CONFIDENTIAL INFORMATION

There is no confidential information in the Title V permit.

PUBLIC PARTICIPATION

The original public notice regarding the draft permit was in the August 5, 2003, edition of the *Richmond Times-Dispatch*. Public comments were accepted until September 3, 2003. The minor modification to incorporate the requirements of the NOx Budget Program did not require a public comment period. EPA was given 45-days to review the proposed amended permit.

Attachments:

- A – 2001 Annual Emissions Update Report
- B – Best Management Practices Plan
- C – NOx Permit Application and Regulations
- D – Phase II Acid Rain Permit issued on November 25, 2002